

**UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

In re:	§	
	§	Chapter 11
	§	
FIELDWOOD ENERGY III LLC, et al.,	§	Case No. 20-33948 (MI)
	§	
Post-Effective Date Debtors.¹	§	(Jointly Administered)
	§	

**PLAN ADMINISTRATOR’S WITNESS AND EXHIBIT LIST FOR
EMERGENCY HEARING ON DECEMBER 22, 2022**

The administrator of the chapter 11 plan (the “Plan Administrator”) of the above-captioned post-effective date debtors (collectively, the “Post-Effective Date Debtors”) files this *Witness and Exhibit List* for the emergency hearing on the *Plan Administrator’s Emergency Motion for Authority to Sell Certain Assets of Post-Effective Date Debtor Fieldwood Energy III LLC* [Docket No. 2719] scheduled for **December 22, 2022 at 9:00 a.m. (Central Time)** (the “Hearing”)

WITNESSES

The Plan Administrator may call any of the following witnesses at the Hearing:

1. David M. Dunn, the Plan Administrator;
2. Any witness called or listed by any other party; and
3. Any witness required for rebuttal or impeachment.

¹ The Post-Effective Date Debtors, along with the last four digits of each Post-Effective Date Debtor’s federal tax identification numbers, as applicable, are: Fieldwood Energy III LLC (6778); Fieldwood Energy Offshore LLC (4494), Fieldwood Energy Inc. (4991), GOM Shelf LLC (8107), and FW GOM Pipeline, Inc. (8440). Fieldwood Energy III LLC, Fieldwood Energy Offshore LLC, and Fieldwood Energy Inc. are managed and operated by the Plan Administrator, whose primary mailing address is 700 Canal Street, Suite 12E, Stamford CT 06920 of Province LLC. GOM Shelf LLC and FW GOM Pipeline, Inc. are managed and operated by Jon Graham, as sole manager of each Post-Effective Date FWE I Subsidiary. The Debtors in the other nine pending chapter 11 cases (which continue to be jointly administered with the cases of the Post-Effective Date Debtors), each of which have either been dissolved or merged into other entities as of the Effective Date, consist of the following: Dynamic Offshore Resources NS, LLC (0158); Fieldwood Onshore LLC (3489); Fieldwood SD Offshore LLC (8786); Fieldwood Offshore LLC (2930); Bandon Oil and Gas GP, LLC (9172); Bandon Oil and Gas, LP (9266); Fieldwood Energy SP LLC (1971); Galveston Bay Pipeline LLC (5703); and Galveston Bay Processing LLC (0422).

EXHIBITS

The Plan Administrator may offer into evidence any one or more of the following exhibits:

Exhibit No.	Description	Offered	Objection	Admitted	Disposition After Hearing
1.	<i>Declaration of David M. Dunn In Support of Plan Administrator's Emergency Motion for Authority to Sell Certain Assets of Post-Effective Date Debtor Fieldwood Energy III LLC [Docket No. 2719-1].</i>				
2.	Any exhibits listed, designated, or offered by any other party.				
3.	Any exhibits necessary for rebuttal.				
4.	Any document filed with or entered by the Court on the docket in the above-captioned bankruptcy cases.				

RESERVATION OF RIGHTS

The Plan Administrator reserves the right to modify, amend or supplement this Witness and Exhibit List at any time. The Plan Administrator reserves the right to ask the Court to take judicial notice of pleadings, orders, transcripts and/or documents filed in or in connection with the above-captioned bankruptcy cases, to offer rebuttal exhibits, and to supplement or amend this Witness and Exhibit List at any time prior to the Hearing. Designation of any exhibit above does not waive any objections the Plan Administrator may have to any exhibit listed on any other party's exhibit list.

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Dated: December 21, 2022

Respectfully submitted,

/s/ Joseph R. Dunn

Joseph R. Dunn, Esq. (admitted pro hac vice)

Abigail V. O'Brien, Esq. (admitted pro hac vice)

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Counsel for the Plan Administrator

Certificate of Service

I hereby certify that, on December 21, 2022, a true and correct copy of the foregoing document was served by the Electronic Case Filing System for the United States Bankruptcy Court for the Southern District of Texas.

/s/ Joseph R. Dunn

Joseph R. Dunn